

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROTHSCHILD BROADCAST	)	
DISTRIBUTION SYSTEMS, LLC,	)	
	)	
Plaintiff,	)	C.A. No. 20-392-MN
	)	
v.	)	
	)	
DEEZER, INC.,	)	
	)	
Defendant.	)	

**DEFENDANT DEEZER, INC.'S MOTION TO DISMISS COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and 35 U.S.C. § 101 Defendant Deezer, Inc. (“Deezer”) hereby moves to dismiss with prejudice Plaintiff Rothschild Broadcast Distribution Systems, LLC Complaint (D.I. 1) for failure to state a claim upon which relief may be granted. The grounds for this motion are set forth in Deezer’s Opening Brief, which is submitted herewith.

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Michael A. Oblon  
JONES DAY  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20002  
Tel: (202) 879-3939

By: /s/ Bindu A. Palapura  
David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Stephanie E. O’Byrne (#4446)  
Tracey E. Timlin (#6469)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
[dmoore@potteranderson.com](mailto:dmoore@potteranderson.com)  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)  
[sobyne@potteranderson.com](mailto:sobyne@potteranderson.com)  
[ttimlin@potteranderson.com](mailto:ttimlin@potteranderson.com)

Dated: May 5, 2020  
6712562 / 50151

*Attorneys for Defendant Deezer, Inc.*